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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

AMARTE USA HOLDINGS, INC.,

Plaintiff,

vs.

ASCENDANT BEAUTY, LLC, et al.,

Defendants.

Case No. 3:21-cv-01993-RS

**STIPULATED REQUEST TO
EXTEND THE CASE SCHEDULE;
ORDER
AS MODIFIED BY THE COURT**

Plaintiff Amarte USA Holdings, Inc., on the one hand, and Defendants Ascendant Beauty, LLC, Guthy-Renker LLC, JLO Holding Company, LLC, and Sephora USA, Inc., on the other hand, respectfully submit this Stipulated Request to Extend the Case Schedule, with reference to the following facts:

1. On June 24, 2021, the Court issued an Initial Case Management Scheduling Order (Dkt. No. 39; the “Scheduling Order”) setting the case schedule for this action.
2. The Parties have engaged in good faith settlement negotiations in an attempt to resolve this dispute on mutually agreeable terms.
3. As a result of those negotiations, the Parties have reached an agreement in principle to completely resolve this action.
4. The Parties are working diligently to finalize and memorialize the settlement agreement, and desire to do so without incurring unnecessary burdens or expenses in the meantime.
5. The Scheduling Order provides a deadline of January 10, 2022, by which the Parties are to complete all non-expert discovery, with the schedule for expert witnesses, pretrial motions, and trial following thereafter.
6. The Parties respectfully submit that good cause exists for the Court to extend the case schedule by approximately 90 days, as reflected in the table below, thereby allowing the Parties to focus their efforts on expeditiously finalizing the settlement and resolving this action without unnecessarily expending significant resources on taking and completing discovery in advance of the approaching January 10 cut-off date:

Event	Current Date/Deadline	New Date/Deadline
Close of Fact Discovery	January 10, 2022	April 11, 2022
Further Case Management Conference	January 20, 2022	April 21, 2022
Affirmative Expert Designations	February 11, 2022	May 13, 2022
Supplemental/Rebuttal Expert Designations	March 11, 2022	June 10, 2022
Close of Expert Discovery	April 15, 2022	July 15, 2022
Pretrial Motions Due	June 23, 2022	September 22, 2022

Event	Current Date/Deadline	New Date/Deadline
Final Pretrial Conference	September 21, 2022	January 4, 2023
Trial	October 3, 2022	January 17, 2023

IT IS SO STIPULATED.

Dated: December 2, 2021

IPLA, LLP

By: /s/ Benjamin S. White
 John M. Kim
 Joshua J. Richman
 Benjamin S. White

CALDARELLI HEJMANOWSKI PAGE & LEER, LLP
 William J. Caldarelli

Attorneys for Plaintiff Amarte USA Holdings, Inc.

Dated: December 2, 2021

LEWIS & LLEWELLYN LLP

By: /s/ Paul T. Llewellyn
 Paul T. Llewellyn

Attorneys for Defendant JLO Holding Company, LLC

Dated: December 2, 2021

LATHAM & WATKINS LLP

By: /s/ Jennifer L. Barry
 Jennifer L. Barry
 David J. Schindler

Attorneys for Defendants Ascendant Beauty, LLC; Guthy-Renker, LLC; and Sephora USA, Inc.

ATTESTATION

I, Jennifer L. Barry, am the ECF user whose identification and password are being used to file this document. Pursuant to the Northern District of California's Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from each of the other signatories.


Dated: December 2, 2021

/s/ Jennifer L. Barry
Jennifer L. Barry

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 12/2/2021


THE HONORABLE RICHARD SEEBORG
Chief United States District Judge